

THE HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	No. CR24-086-TL
Plaintiff,)	
v.)	MOTION TO SEAL DOCUMENT
KEITH D. FREERKSEN,)	Note on Motion Calendar:
Defendant.)	February 10, 2025

Keith Freerksen, through counsel, moves this Court to order that Exhibit 4 in support of the Defendant's Sentencing Memorandum be filed under seal and secured from public access until further order of the Court. This motion is based on the confidential information contained in the document, which if made public could result in irreparable harm to Mr. Freerksen. The right of access is outweighed by the interests of both the public and the parties in protecting the substance of this document from public view. There is compelling reason to order that Exhibit 4 be sealed.

DATED this _____ day of January 2025

Respectfully submitted,

s/ Dennis Carroll

Assistant Federal Public Defender
Attorney for Keith Freerksen

I certify this motion contains 95 words in compliance with the Local Criminal Rules.